

Federal Defenders OF NEW YORK, INC.

Southern District
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Leonard F. Joy
Executive Director

MEMO ENDORSED

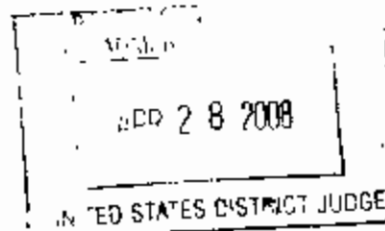
Southern District of New York
John J. Byrnes
Attorney-in-Charge

April 28, 2008

by fax 212 805-7927

Honorable Naomi Reice Buchwald
United States District Judge
Southern District of New York

Re: United States v. Ramon Antonio Morel
07 Cr.1000(NRB)



Your Honor:

We respectfully request that sentence due to be imposed today, April 28, 2008, be adjourned to 11:00a.m., May 13, 2008 - a date and time suggested by your Honor's chambers. I have sought the government's consent from John P. Cronan, Esq., AUSA, tel. 212 637-2779 and Todd W. Blanche, Esq., AUSA 212 637-2494 by voice-mail but haven't yet heard back.

I am still hoping that certain records potentially relevant to sentence might finally be located and produced by Mr. Morel's family by then and I need to prepare a sentencing submission. I propose to proceed the next time whether or not these records which I have requested from the family for months have been produced.

I apologize for this second last minute application and do not believe that it will prejudice incarcerated Mr. Morel since the Probation Department-estimated guidelines range is 30-37 months, the government's Pimentel letter estimates 24-30 and our client will have been in custody about 7 months by the April 28 proposed date.

Respectfully,

[Signature]
Roland Thau
Staff Attorney
Tel.: 212 417-8733

cc: John P. Cronan Esq., AUSA
by fax 212 637-2390

